

Ex. 'A'

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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In Re:

MELANI SCHULTE and  
WILLIAM SCHULTE,

2704 SATTLEY LLC,  
HOT ENDEAVOR LLC,  
1341 MINUET LLC,  
1708 PLATO PICO LLC,  
2228 WARM WALNUT LLC,  
9425 VALLEY HILLS LLC,  
9500 ASPEN GLOW LLC,  
5218 MISTY MORNING LLC,  
CHERISH LLC,  
SABRECO INC.,  
KEEP SAFE LLC,

Debtors.

Case No. 09-29123-MKN

Chapter 11

Jointly Administered with:

09-27238-MKN  
09-27909-MKN  
09-27910-MKN  
09-27911-MKN  
09-27912-MKN  
09-27913-MKN  
09-27914-MKN  
09-27916-MKN  
09-28513-MKN  
09-31584-MKN  
09-31585-MKN

Date: June 23, 2021  
Time: 9:30 a.m.

**PURSUANT TO 28 U.S.C. §1746 MELANI SCHULTE  
DECLARES THE FOLLOWING:**

I, Melani Schulte, declare under penalty of perjury the following:

1. That I am one of the above-mentioned Debtors in this chapter 11 bankruptcy case filed on October 11, 2009.
2. That there are eight properties that SN Servicing has allegedly been servicing: these include, 1624 Desert Canyon Court Las Vegas, NV 89128; 4521 W. La Madre Way North Las Vegas, NV 89031; 922 Saddle Horn Drive Henderson NV 89015; 5609 San Ardo PL Las Vegas, NV 89130; 1194 Stormy Valley Road Las Vegas, NV 89123; 2525 Via Di Autostrada Henderson NV 89074; 3322 Cheltenham Street, Las Vegas, Nevada 89129; 8216 Peaceful Canyon Drive, Las Vegas, Nevada 89128, in which Court orders were entered about a decade

1 ago.

- 2 3. That there is a ninth property located at 8562 Lambert Drive Las Vegas, NV  
3 89147 that SN Servicing allegedly services where no stipulation was entered  
4 into by the parties or Court Order.
- 5 4. That during the years that SN Servicing has serviced these loans, despite  
6 numerous requests by me over the years, I have never received a single  
7 statement from SN Servicing on any of these nine properties regarding the  
8 principal, interest, insurance or property tax amount owed.
- 9 5. That on two of these properties, 8216 Peaceful Canyon Drive, Las Vegas,  
10 Nevada 89128 and 3322 Cheltenham Street, Las Vegas 89129, Orders were  
11 entered stating I was to make escrow payments directly on these properties  
12 (see Dkt.#869, p.2, ln.13-15 and Dkt.#593, p.2, ln.11-13).
- 13 6. That on six of the seven remaining properties, excluding 8562 Lambert Drive  
14 Las Vegas, NV 89147, the order states that I have to pay escrow directly to the  
15 Secured Creditor for *advances*.
- 16 7. That since I never received any statements on the amount of escrow  
17 payments, I chose to pay and contacted the Clark County Treasurer Assessor's  
18 Office to determine the property tax owed, because I didn't want any tax or  
19 insurance authority to attempt foreclosure or not have insurance on a  
20 property.
- 21 8. That because I never received *any* statements from SN Servicing that I have  
22 been paying for the taxes and insurance directly on these seven remaining  
23 properties, plus the two other properties.
- 24 9. That I only received one transfer of claim from BSI to SN Servicing (for US  
25 Bank) and that was on 922 Saddle Horn Drive, Henderson NV 89015.
- 26 10. That the nine properties that SN is servicing have been sold or exchanged  
27 many times since the 2011 confirmation order. Each time, if I was able to find  
28 out in a timely manner who serviced the loan at that time, after not sending  
me adequate notice of the change in servicing, I wrote or called that servicer  
and asked them to please abide by the 2011 bankruptcy Confirmation Order  
(Dkt.#912). I continuously tried to keep up with each different servicer

1 change for all the properties to no avail, because they rarely responded to my  
2 inquiries.

3 11. That the Desert Canyon property started with Citimortgage, then Seterus and  
4 Fannie Mae, then Selene Finance, and now SN Servicing.

5 12. That the La Madre property started with Ctimgage, then Seterus and  
6 Fannie Mae, then Selen Finance, and now SN Servicing.

7 13. That the Saddle Horn property started with Ctimgage, then Seterus and  
8 Fannie Mae, then BSI Finance, and now SN Servicing.

9 14. That the San Ardo property started with Ctimgage, then Seterus and  
10 Fannie Mae, then Shellpoint, and now SN Servicing.

11 15. That the Stormy Valley property started with Ctimgage, then Seterus and  
12 Fannie Mae, and now SN Servicing.

13 16. That the Via Di Autostrada property started with Ctimgage, then Seterus  
14 and Fannie Mae, and now SN Servicing.

15 17. That the Cheltenham property started with BAC Home Loans, then Seterus  
16 and Fannie Mae, then Nationstar/Mr. Cooper, and now SN Servicing.

17 18. That the Peaceful Canyon property started with Chase Home Finance/JP  
18 Morgan Chase, then Shellpoint Mortgage Servicing, and now SN Servicing.

19 19. That the Lambert property started with Ctimgage, then Seterus and Fannie  
20 Mae, Nationstar/Mr. Cooper, and now SN Servicing. I'm not sure SN  
21 Servicing has filed a transfer of claim, or any documentation that they are the  
22 true owners of this mortgage. Thus, I have been making all of the mortgage  
23 payments to Nationstar/Mr. Cooper and for over a year now, but they have  
24 not cashed those checks. All of the money for those payments are still in the  
25 DIP account for Schulte Properties LLC. In addition despite the automatic  
26 stay in the Schulte Properties LLC bankruptcy, either Nationstar/Mr. Cooper  
27 and/or SN Servicing filed a notice of default on the property based upon non-  
28 payment related to uncashed checks.

20. That what's interesting is that SN Servicing will not send me my monthly  
mortgage statements to show how they have applied the payments that I have  
mailed and that they have cashed. But clearly SN Servicing has my address as

1 they sent me my 2020 IRS form 1098 for tax and interest statements for the  
2 Stormy Valley, Via Di Autostrada, La Madre, Peaceful Canyon, San Ardo, and  
3 Cheltenham properties.

4 21. That it seems like a prior servicer would not correct their documentation on  
5 the loan and then turn around and sell it off to someone else without giving  
6 them all the information. Every time I would contact them about following  
7 the bankruptcy Confirmation Order, I was told that there was no notation in  
8 the file of the bankruptcy or that this is the information that they got from the  
9 previous servicer and they were going to stick to it with their information and  
10 ignore my complaints and request for them to correct their records. I had no  
11 other choice but to record for each of the 32 properties, at the Clark County  
12 Records Office the complete 76 page confirmation order to try to get their  
13 attention.

14 22. That still hasn't worked.

15 Dated this 10<sup>th</sup> day of June 2021.

16 /s/Melani Schulte  
17 Melani Schulte  
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